

# EXHIBIT 2

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4

5 In re FTCA Flint Water Cases,  
6

7 Civil No. 4:17-cv-11218

8 (Consolidated)

9 Linda V. Parker

10 United States District Judge  
11  
12  
13  
14

15 The Videotaped Deposition of JENNIFER HUFFMAN, Ph.D.,  
16 Taken at 221 North Main Street, Suite 300,  
17 Ann Arbor, Michigan,  
18 Commencing at 1:00 p.m.,  
19 Monday, September 9, 2024,  
20 Stenographically Reported By  
21 Wendy M. Taylor, CSR-6922.  
22  
23  
24  
25





Case 4:17-cv-11218-LVP-CI ECF No. 304-3, PageID.9363 Filed 10/21/24 Page 5 of 25





Page 114

1 assessing community mental health?

2 A. Yes.

3 Q. What would that be?

4 A. Well, there's a variety of ways, it can be knocking on  
5 doors and administering questionnaires or interviews  
6 of individuals, it can be making random phone calls  
7 within a community, it can be assessing all corners  
8 within an emergency room, for example, in a particular  
9 community, there can be a variety of ways of looking  
10 at community mental health.

11 Q. Have you been involved in any of those?

12 A. Not directly, no.

13 Q. Indirectly?

14 A. Through reading or research.

15 Q. Have you been involved in doing any of that  
16 assessment?

17 A. No.

Age Group	Percentage
18-24	35%
25-34	25%
35-44	20%
45-54	15%
55-64	10%
65+	5%

Age Group	Percentage
18-24	35%
25-34	25%
35-44	15%
45-54	10%
55-64	5%
65-74	3%
75-84	2%
85+	1%

22 Q. Okay. Were you asked to look the impact of the water  
23 conditions on the community's mental health and  
24 emotional wellbeing?  
25 A. Inasmuch as these individuals within the case are part

[illegible]

Page 117

1 of the community, it was definitely something that I  
2 considered.

3 Q. Did you do any questionnaires to other members of the  
4 community?

5 A. No.

6 Q. Did you knock on any doors?

7 A. No.

8 Q. Okay. Did you talk to any community leaders?

9 A. No.

10 Q. Did you do interviews with mental health experts in  
11 the community?

12 A. Other than informal conversations, no.

13 Q. Who did you talk to, mental health experts, in the  
14 Flint community, even informally?

15 A. At various points I know Kirk Stucky.

16 Q. And you spoke to him?

17 A. Very generally and vaguely, not anything in  
18 particular.

19 Q. How many times did you speak to him?

20 A. He and I are colleagues so I don't know. I couldn't  
21 give you an exact number.

22 Q. More than three?

23 A. Nothing specific about this case.

24 Q. Well, about the Flint water crisis?

25 A. Correct.



<p style="text-align: right;">Page 118</p> <p>1 Q. And what was the substance of those discussions?</p> <p>2 A. I don't recall.</p> <p>3 Q. Nothing?</p> <p>4 A. As I said, it was just general reactions and</p> <p>5 discussions about the experiences.</p> <p>6 Q. Did he feel that there was community trauma?</p> <p>7 A. I would not be able to characterize his opinions about</p> <p>8 it based on our conversations.</p> <p>9 Q. Did he offer you any insight into the Flint water</p> <p>10 crisis's impact on the community?</p> <p>11 A. I'm sure he did but they were general conversations</p> <p>12 that happened years ago so I couldn't tell you about</p> <p>13 them or the substance of those conversations today.</p> <p>14 Q. So you don't recall any of it?</p> <p>15 A. Right.</p> <p>16 Q. Anyone else you spoke to?</p> <p>17 A. I may have but I couldn't tell you a specific person</p> <p>18 or name.</p> <p>19 Q. Well, did you speak to any of the mental-health</p> <p>20 experts about the --</p> <p>21 A. Not related to this case, no.</p> <p>22 Q. Or the Flint water crisis?</p> <p>23 A. I may have.</p> <p>24 Q. I'm asking you for their names?</p> <p>25 A. I -- as I said, I couldn't tell you their names.</p>	<p style="text-align: right;">Page 120</p> <p>1 A. I'm not seeing any jump out at me.</p> <p>2 Q. Let me know.</p> <p>3 A. I know I've looked at some of the work by Dr. Attisha.</p> <p>4 Q. What did you review? Did you review the report from</p> <p>5 the American Journal of Public Health on Elevated</p> <p>6 Blood Levels in Children Associated With the Flint</p> <p>7 water crisis?</p> <p>8 A. I don't know if it was that one specifically. I don't</p> <p>9 know if she's written more than one article. I would</p> <p>10 imagine she has.</p> <p>11 Q. But you don't recall if you read this one?</p> <p>12 A. I don't recall.</p> <p>13 Q. Any others that you think seem vaguely familiar to</p> <p>14 you?</p> <p>15 A. I may have, whether they're on my resources relied on,</p> <p>16 I don't know. I read Vonnie McLoyd's declaration.</p> <p>17 Q. That's our expert. You read her declaration?</p> <p>18 A. Right. I've looked at the National Center for PTSD</p> <p>19 website. I've looked at some of the work by Sneed.</p> <p>20 Q. Did you review The Behavior Health Concerns During the</p> <p>21 Flint water crisis of Community from the community</p> <p>22 mental health?</p> <p>23 A. Is that the Sneed article?</p> <p>24 Q. That's the one cited here?</p> <p>25 A. I may have.</p>
<p style="text-align: right;">Page 119</p> <p>1 Q. Did you speak to any Flint community leaders?</p> <p>2 A. Not to my knowledge.</p> <p>3 Q. Did you review the available research with regard to</p> <p>4 the Flint water crisis and the community mental</p> <p>5 health?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. I'm going to show you what's been marked as</p> <p>8 Exhibit 4 and I'll ask you to look through this and</p> <p>9 tell me which of those, which of that literature you</p> <p>10 reviewed?</p> <p>11 MR. COHEN: Do you have additional copies</p> <p>12 of that?</p> <p>13 MS. LABELLE: Sorry, these are the -- and</p> <p>14 if it helps at all, those are some of the source</p> <p>15 materials relied upon by Dr. Reicherter.</p> <p>16 BY MS. LABELLE:</p> <p>17 Q. Can you tell me -- if you can tell me which ones you</p> <p>18 reviewed as you're going through it, just shout it</p> <p>19 out. Any on page 1?</p> <p>20 A. I mean, I'm certainly familiar with the Diagnostic and</p> <p>21 Statistical Manual of Mental Disorders, 5 TR.</p> <p>22 Q. Right, that's a general citation, but any of the</p> <p>23 others that are specific to Flint?</p> <p>24 A. As far as research that I reviewed in detail?</p> <p>25 Q. Yes.</p>	<p style="text-align: right;">Page 121</p> <p>1 Q. Anything else?</p> <p>2 A. I may have, nothing that stands out.</p> <p>3 Q. Do you recall reading the article in JAMA by Reuben,</p> <p>4 Cohen, and Friedman on the Prevalence of Depression of</p> <p>5 Posttraumatic Stress Disorders in Flint, Michigan,</p> <p>6 Five Years After the Onset of the Water Crisis?</p> <p>7 A. I don't recall.</p> <p>8 Q. What journals do you get regularly?</p> <p>9 A. Journals in Neuropsychology.</p> <p>10 Q. Which ones?</p> <p>11 A. Like the Clinical Psychologists.</p> <p>12 Q. Clinical Psychologist?</p> <p>13 A. Archives of Clinical Neuropsychology.</p> <p>14 Q. Anything else?</p> <p>15 A. Those are the two main that I receive.</p> <p>16 Q. Do you get the Journal of Community Psychology?</p> <p>17 A. No.</p> <p>18 Q. So did you -- you don't recall reading Toxic Trauma,</p> <p>19 Household Water Quality Experience, Posttraumatic</p> <p>20 Stress Disorder Symptoms During the Flint, Michigan,</p> <p>21 Water Crisis?</p> <p>22 A. No.</p> <p>23 Q. Do you get the Journal of Urban Health?</p> <p>24 A. No.</p> <p>25 Q. So do you recall reading Community Perceptions of the</p>



Page 141

1 CERTIFICATE OF NOTARY  
2 STATE OF MICHIGAN )  
3 ) SS  
4 COUNTY OF LIVINGSTON)  
5  
6 I, WENDY M. TAYLOR, certify that this  
7 deposition was taken before me on the date  
8 hereinbefore set forth; that the foregoing questions  
9 and answers were recorded by me stenographically and  
10 reduced to computer transcription; that this is a  
11 true, full, and correct transcript of my stenographic  
12 notes so taken; and that I am not related to, nor of  
13 counsel to, either party nor interested in the event  
14 of this cause.  
15  
16  
17  
18  
19  
20  
21  
22 WENDY M. TAYLOR, CSR-6922  
23 Notary Public,  
24 Livingston County, Michigan  
25 My Commission expires: 1-10-29

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4

5 In re FTCA Flint Water Cases,

6  
7 Civil No. 4:17-cv-11218

8 (Consolidated)

9 Linda V. Parker

10 United States District Judge  
11  
12

13 VOLUME II  
14

15 The Continued Videotaped Deposition of

16 JENNIFER HUFFMAN, Ph.D.,

17 Taken at 221 North Main Street, Suite 300,

18 Ann Arbor, Michigan,

19 Commencing at 1:00 p.m.,

20 Tuesday, September 10, 2024,

21 Stenographically Reported By

22 Wendy M. Taylor, CSR-6922.  
23  
24  
25



Page 163

Page 165

1 length of time it would take for you to be exposed to  
2 certain levels of lead to have an IQ detriment?  
3 A. I would defer to a toxicologist or an epidemiologist.  
4 Q. Well, that's my point, you're not an expert in  
5 toxicology, are you?  
6 A. I'm not.  
7 Q. And you're not an expert in epidemiology?  
8 A. I'm not.

Page 164

So I'm not asking for the literature. I'm asking for your opinions as an expert on the impact of lead exposure in cognitive development.

What is the level of lead, over what period of time, that results in cognitive injury to a child?

A. So if we're talking about the kind of cognitive injury that can be measured using our tests, let's say an IQ test, I think the blood lead levels would need to be close to 20 or 30 micrograms per deciliter before we can really, in an individual child, measure demonstrable change.

Q. 20 to 30 over what period of time?

A. Over -- for whatever period of time there was. I mean, I'm not sure what you mean. It would have to be more than a day, you know.

Q. Okay. How much longer than a day?

A. I don't think I can, based on my knowledge of the literature, give an answer to that question.

Q. I'm asking you based on your asserted expertise in the impact of lead exposure in cognitive development, would 24 hours be sufficient to show an IQ detriment?

A. I have no opinion on the length of time required.

Q. How can you be an expert on the impact of lead exposure and cognitive development and not know the

[illegible]

Page 175

Page 177

1 expert in epidemiology, correct?

2 A. Correct.

3 Q. You're not an expert in public health?

4 A. Correct.

5 Q. You've never done any studies or participated in

6 studies or designed studies or had any experience with

7 assessing the health of a community?

8 A. Correct.

9 Q. You're not familiar with the methodologies related to

10 the assessment of public health in a community, is

11 that correct?

12 A. No.

13 Q. That's not correct?

14 A. It's not correct.

15 Q. Was that because that's the door knocking and the

16 putting out questionnaire methodology questions that

17 we talked about?

18 A. Yes.

19 Q. Could you be more specific about that? What is the

20 number of individuals in a community of 90,000 that

21 would -- you would have to survey or provide

22 questionnaires for to have a valid public community

23 health survey?

24 A. I can't give that number.

25 Q. Why, because you don't know it?

Page 178

1 A. I don't know the specifics on how many would be  
2 required.  
3 Q. You don't know the methodology for that, do you?  
4 A. Not to that level of detail.  
5 Q. Does your knowledge of methodology in assessing  
6 community public health stop at you sending out  
7 questionnaires, you knocking on doors, or making phone  
8 calls?  
9 A. Yes.  
10 Q. You've not testified in the past about public health  
11 or community health in a court of -- court of law?  
12 A. Correct.  
13 Q. You've not reviewed any academic scholarship, I'm  
14 correct?  
15 A. Correct.  
16 Q. Not public -- any article on public health or  
17 community health?  
18 A. Correct.  
19 Q. Do you have any degrees in this area?  
20 A. No.  
21 Q. And just to be clear, you've not published in this  
22 area of community public health?  
23 A. That's correct.  
24 Q. Let's go over -- and that would be the same for  
25 community trauma, you haven't published any opinions

<p style="text-align: right;">Page 179</p> <p>1 about community trauma?</p> <p>2 A. That's correct.</p> <p>3 Q. You have no publications and you've not done a review</p> <p>4 of academic scholarship and have no prior reports or</p> <p>5 testimony in this area?</p> <p>6 A. That's correct.</p> <p>7 Q. Okay. Have you done any work as a researcher in the</p> <p>8 last 20 years?</p> <p>9 A. We already covered this yesterday. I would refer you</p> <p>10 to my previous responses.</p> <p>11 Q. Okay. Have you ever directed research into areas of</p> <p>12 impact on race or economics in a community?</p> <p>13 A. No.</p> <p>14 Q. Have you ever directed research into areas of the</p> <p>15 impact of race or economics on children?</p> <p>16 A. No.</p> <p>17 Q. Have you ever directed research into areas of impact</p> <p>18 of race or economics on an individual?</p> <p>19 A. No.</p> <p>20 Q. Have you had any training in this area?</p> <p>21 A. Training on racial information?</p> <p>22 Q. Yes, the impact of race or economics in community on</p> <p>23 children?</p> <p>24 A. I've attended seminars on racial disparities.</p> <p>25 Q. Who presented those seminars?</p>	<p style="text-align: right;">Page 181</p> <p>1 Q. Have you ever received a grant for research in your</p> <p>2 own name?</p> <p>3 A. No.</p> <p>4 Q. Have you ever directed a research product involving</p> <p>5 child development?</p> <p>6 A. No.</p> <p>7 Q. Have you ever published in the area of impact of race</p> <p>8 or economics on community mental health?</p> <p>9 A. No.</p> <p>10 Q. Have you ever taught a class on research?</p> <p>11 A. Not specifically on research, no.</p> <p>12 Q. What is, not specifically? What kind of class have</p> <p>13 you taught that is somewhat related to research</p> <p>14 techniques?</p> <p>15 A. I've taught basic classes in abnormal psychology and</p> <p>16 in human sexuality --</p> <p>17 Q. When did you --</p> <p>18 A. -- that would have touched on those topics.</p> <p>19 Q. And when is the last time you taught a class?</p> <p>20 A. I would refer you to my CV. I can look.</p> <p>21 Q. Yes, please.</p> <p>22 A. 1997.</p> <p>23 Q. What was the name of that class?</p> <p>24 A. Human Sexuality.</p> <p>25 Q. Where did you teach it?</p>
<p style="text-align: right;">Page 180</p> <p>1 A. I don't recall.</p> <p>2 Q. Do you recall the last one you attended?</p> <p>3 A. No.</p> <p>4 Q. Do you recall any that you attended?</p> <p>5 A. No.</p> <p>6 Q. Have you ever heard of the Society For Research and</p> <p>7 Child Development?</p> <p>8 A. No.</p> <p>9 Q. So I can assume you're not a member?</p> <p>10 A. Correct.</p> <p>11 Q. Have you heard about the National Adolescent Health</p> <p>12 Survey?</p> <p>13 A. I don't know anything specific about it.</p> <p>14 Q. Have you heard of the Society For Research in Child</p> <p>15 Development?</p> <p>16 A. I've heard of it.</p> <p>17 Q. Are you a member?</p> <p>18 A. No.</p> <p>19 Q. Do you get the Journal of Research on Adolescents?</p> <p>20 A. No.</p> <p>21 Q. Do you get the Journal of Black Psychology and Child</p> <p>22 Development?</p> <p>23 A. No.</p> <p>24 Q. Are you a member of the National Academy of Science?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 182</p> <p>1 A. Wayne State University.</p> <p>2 Q. And were you the sole instructor?</p> <p>3 A. I was, yes.</p> <p>4 Q. And was it one semester?</p> <p>5 A. It was.</p> <p>6 Q. Was it an undergraduate class?</p> <p>7 A. Yes, sorry, I misspoke, the most recent course I</p> <p>8 taught was abnormal psychology in 1999.</p> <p>9 Q. So 25 years ago?</p> <p>10 A. Yes.</p> <p>11 Q. Where was that?</p> <p>12 A. Jackson Community College.</p> <p>13 Q. Was that one semester?</p> <p>14 A. Yes.</p> <p>15 Q. You were the sole instructor?</p> <p>16 A. Yes.</p> <p>17 Q. But you've never taught a class specifically on</p> <p>18 research techniques?</p> <p>19 A. Correct.</p> <p>20 Q. Have you ever taught a class on childhood policy and</p> <p>21 development?</p> <p>22 A. No.</p> <p>23 Q. What about a class in adolescent development and</p> <p>24 poverty?</p> <p>25 A. No.</p>



Page 183

1 Q. Have you ever offered any opinions in court or  
2 testified with regard to adolescent development,  
3 poverty, or racial impacts?  
4 A. No.  
5 Q. I think we talked about the journals you subscribe to  
6 and none of those focus on the effects of trauma, do  
7 they?  
8 A. The journals themselves aren't specific to the topic  
9 of trauma. Certainly trauma may be presented as a  
10 research study within those journals.

24 Q. Have you ever published in the area of trauma impact  
25 stressors, how to assess trauma, treat trauma, or

Page 184

1 identify the consequences of trauma?

2 A. No.

3 Q. Have you ever reviewed any scholarly articles for

4 purposes of peer review related to trauma, trauma

5 impact, stressors, how to assess trauma, treat trauma,

6 or identify the consequences of trauma?

7 A. No.

8 Q. You don't have any specialized expertise in trauma and

9 its impact, do you?

10 A. I do not.

11 Q. I believe you testified that you treated in your

12 clinical practice a handful of adults in your career

13 for trauma-related symptoms.

14 Have you ever diagnosed someone with PTSD?

15 A. Yes.

16 Q. How many?

17 A. I don't recall.

18 Q. How many have you treated?

19 A. That question was asked and answered.

20 Q. As a result of the diagnosis of PTSD?

21 And your counsel can make objections.

22 A. You started this line of questioning by stating how

23 many people I said I treated in my clinical practice

24 specifically for trauma, that would be the same answer

25 here.

Page 185

1 Q. A handful?

2 A. Right.

3 Q. But did you treat any of them for PTSD?

4 A. That was the response to how many people I treated.

5 Q. Okay. Have you ever worked in developing a curriculum

6 for training on how to handle victims of trauma or

7 people suffering from trauma?

8 A. No.

9 Q. You mentioned that you worked with combat veterans as

10 an intern.

11 Can you tell me when that was, what year?

12 A. From September 1999 to August 2000.

13 Q. So less than a year?

14 A. One year.

15 Q. What were your duties and responsibilities?

16 A. I conducted psychological and neuropsychological

17 assessments, report writing, psychotherapy, case

18 conferences, interdisciplinary grounds, presentations,

19 attended seminars, special rotations in geriatric

20 neuropsychology, and multidisciplinary pain management

21 involving assessment and treatment of patients from --

22 suffering from chronic pain.

23 Q. How many combat veterans did you do assessments on?

24 A. I don't recall.

25 Q. Did you have a supervisor?

Page 186

1 A. I did.  
2 Q. Who was that?  
3 A. My supervisors at the time were Ken Adams, Lenard  
4 Spielhaus (phonetic), Gus Bucktal (phonetic), there  
5 were others whose names I can't recall.  
6 Q. Since that time have you ever worked with combat  
7 veterans?  
8 A. Yes.  
9 Q. And in what context?  
10 A. Performing evaluations.  
11 Q. How many in your private practice?  
12 A. In my practice at the hospital.  
13 Q. How many would you say?  
14 A. I don't know.



12 (Pages 183 - 186)

<p style="text-align: right;">Page 187</p> <p>1 Q. Did you look at her CV?</p> <p>2 A. Some time ago.</p> <p>3 Q. Okay. Did you have any other responsibilities as a</p> <p>4 co -- like a coinvestigator, did you collaborate on</p> <p>5 the development and evaluation of any</p> <p>6 psychotherapeutic treatment protocol while you were an</p> <p>7 intern?</p> <p>8 A. No.</p> <p>9 Q. Okay. Did you supervise anyone yourself for the</p> <p>10 therapeutic treatment of traumatized combat veterans?</p> <p>11 A. No.</p> <p>12 Q. Have you ever worked on any research involving trauma</p> <p>13 victims?</p> <p>14 A. Not directly.</p> <p>15 Q. Well, what would be your indirect work?</p> <p>16 A. They may have been trauma victims as part of the</p> <p>17 research studies I've conducted.</p> <p>18 Q. Which one?</p> <p>19 A. Any one.</p> <p>20 Q. Well, can you point me to that, your research that</p> <p>21 might involve trauma victims?</p> <p>22 A. There could have been a trauma victim in any research</p> <p>23 study as part of the participant.</p> <p>24 Q. Right. But was your research specifically directed to</p> <p>25 working with trauma victims?</p>	<p style="text-align: right;">Page 189</p> <p>1 Q. Have you ever testified as an expert in court on</p> <p>2 trauma?</p> <p>3 A. I have not.</p> <p>4 Q. Have you ever presented expert testimony on trauma</p> <p>5 through a report in your forensic work, other than</p> <p>6 what you're presenting here today?</p> <p>7 A. Sorry, could you repeat the question?</p> <p>8 Q. Have you ever presented what you -- testimony on</p> <p>9 trauma through a report? Have you ever prepared a</p> <p>10 report on trauma in your forensic work --</p> <p>11 A. Yes.</p> <p>12 Q. -- other than what you've done here today?</p> <p>13 A. Yes.</p> <p>14 Q. And where -- where was that, the expert reports on</p> <p>15 trauma?</p> <p>16 A. I have conducted evaluations of individuals exposed to</p> <p>17 trauma as part of my forensic practice.</p> <p>18 Q. Okay. And you've made opinions based upon the trauma</p> <p>19 as a result of that in your cases?</p> <p>20 A. Correct.</p> <p>21 Q. How many cases did you do that in?</p> <p>22 A. I cannot recall.</p> <p>23 Q. One?</p> <p>24 A. More than one.</p> <p>25 Q. More than three?</p>
<p style="text-align: right;">Page 188</p> <p>1 A. No.</p> <p>2 Q. Okay. Have you ever published or reviewed for any</p> <p>3 journal focused on trauma?</p> <p>4 A. No.</p> <p>5 Q. And I think you said you heard of the Journal of</p> <p>6 Traumatic Stress?</p> <p>7 A. I may have.</p> <p>8 Q. You don't get it, do you?</p> <p>9 A. No.</p> <p>10 Q. Okay. Have you ever provided individual or group</p> <p>11 treatment of traumatized adults for clinical or</p> <p>12 research purposes?</p> <p>13 A. No.</p> <p>14 Q. Have you ever developed any courses in trauma for any</p> <p>15 university?</p> <p>16 A. No.</p> <p>17 Q. Have you ever taught any graduate level course in</p> <p>18 trauma or response and recovery?</p> <p>19 A. No.</p> <p>20 Q. Have you presented any papers on trauma at any</p> <p>21 conferences, meetings, associations, events, or</p> <p>22 symposiums?</p> <p>23 A. No.</p> <p>24 Q. Have you ever run any workshops on trauma?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 190</p> <p>1 A. More than three.</p> <p>2 Q. More than five?</p> <p>3 A. More than five.</p> <p>4 Q. Over the last 20 years?</p> <p>5 A. Yes.</p> <p>6 Q. Between 5 and 10?</p> <p>7 A. More than 10.</p> <p>8 Q. None of those resulted in your testifying in court?</p> <p>9 A. Correct.</p> <p>10 Q. In all of those cases did you examine the individual?</p> <p>11 A. I'm sure there were other instances where I conducted</p> <p>12 just record reviews of the cases.</p> <p>13 Q. Do you recall them?</p> <p>14 A. Not directly.</p> <p>15 Q. Can you name a case in which you did an exam on an</p> <p>16 individual and you prepared a report, other than this</p> <p>17 case?</p> <p>18 A. Yes.</p> <p>19 Q. What case would that be?</p> <p>20 A. I cannot recall.</p> <p>21 Q. Well, I'm asking you if you can name a case?</p> <p>22 A. Oh, I'm sorry. I can't name a case, as I sit here</p> <p>23 today.</p> <p>24 Q. What was your dissertation on?</p> <p>25 A. Predictors of Treatment Adherence and the Relationship</p>

<p style="text-align: right;">Page 191</p> <p>1 Between Adherence and Treatment Outcome Among Migraine</p> <p>2 Headache Patients.</p> <p>3 Q. Did you see yourself as an expert in migraine</p> <p>4 headaches?</p> <p>5 A. I completed a dissertation on it at the time and I'm</p> <p>6 not a neurologist. I was really studying the</p> <p>7 treatment adherence and focusing on those predictors.</p> <p>8 Q. Do you see yourself as an expert in that area?</p> <p>9 A. No.</p> <p>10 Q. Okay. Dr. Lebowitz had an opinion that the emotional</p> <p>11 and psychological suffering, emotional and</p> <p>12 psychological suffering was experienced by all members</p> <p>13 of the cohort. We're talking about the adults whose</p> <p>14 records you reviewed.</p> <p>15 Do you disagree with that opinion?</p> <p>16 A. I don't think I would qualify or define the</p> <p>17 experiences they had as suffering or clinically</p> <p>18 impairing experienced distress.</p> <p>19 Q. Well, there's no clinical -- I'm sorry.</p> <p>20 So she doesn't say, clinically impairing.</p> <p>21 She just said her opinion is that they suffered</p> <p>22 emotional and psychological suffering was experienced</p> <p>23 by all members of the cohort. I'm asking if you</p> <p>24 disagree with that?</p> <p>25 A. I can't agree with it not knowing exactly what she</p>	<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 Q. Okay. What were you asked to do with regard to Vonnie</p> <p>21 McLoyd's opinion in this case?</p> <p>22 A. Review the documents and comment on any opinions I</p> <p>23 had.</p> <p>24 Q. Did you advise anyone that you didn't have an</p> <p>25 expertise in the areas of racial disparity, social and</p>
<p style="text-align: right;">Page 192</p> <p>1 means by suffering and the definition of that.</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">Page 194</p> <p>1 economic research?</p> <p>2 A. I was never asked whether I had that expertise.</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>





<p style="text-align: right;">Page 283</p>  <p>15 (The deposition was adjourned at 5:13 p.m.  16 Signature of the witness was not requested by  17 counsel for the respective parties hereto.)  18  19  20  21  22  23  24  25</p>	
<p style="text-align: right;">Page 284</p> <p>1 CERTIFICATE OF NOTARY  2 STATE OF MICHIGAN )  3 ) SS  4 COUNTY OF LIVINGSTON)  5  6 I, WENDY M. TAYLOR, certify that this  7 deposition was taken before me on the date  8 hereinbefore set forth; that the foregoing questions  9 and answers were recorded by me stenographically and  10 reduced to computer transcription; that this is a  11 true, full, and correct transcript of my stenographic  12 notes so taken; and that I am not related to, nor of  13 counsel to, either party nor interested in the event  14 of this cause.  15  16  17  18  19  20  21   22 WENDY M. TAYLOR, CSR-6922  23 Notary Public,  24 Livingston County, Michigan  25 My Commission expires: 1-10-29</p>	

1

1           **ROUGH DRAFT/UNCERTIFIED TRANSCRIPT**  
 2           (REALTIME ROUGH DRAFT AND UNCERTIFIED  
 3           TRANSCRIPT:  
 4           This realtime draft is unedited  
 5           and uncertified and may contain  
 6           untranslated stenographic symbols,  
 7           an occasional court reporter note,  
 8           a misspelled proper name and/or  
 9           unusual word combinations.)  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24

2

1           **ROUGH DRAFT/UNCERTIFIED TRANSCRIPT**  
 2           THE FOLLOWING FILE IS NOT AN OFFICIAL  
 3           TRANSCRIPT. IT IS INTENDED ONLY TO AID  
 4           IN CASE PREPARATION. THE FINAL TRANSCRIPT  
 5           WILL BE DIFFERENT, BOTH IN FORM AND SUBSTANCE,  
 6           FROM THIS ROUGH DRAFT TRANSLATION.  
 7           YOU MAY SEE ERRORS AND OMISSIONS DURING  
 8           THE REALTIME TRANSLATION THIS IS NOT  
 9           AN UNUSUAL PROCESS AND THESE ERRORS AND  
 10          OMISSIONS WILL BE CORRECTED ON THE FINAL  
 11          TRANSCRIPT. PLEASE DO NOT TRY TO BRING THESE  
 12          DISCREPANCIES TO THE ATTENTION OF THE REPORTER  
 13          DURING THE COURSE OF THE DEPOSITION.  
 14  
 15          UNOFFICIAL DRAFT TRANSCRIPT  
 16          THIS IS AN UNOFFICIAL DRAFT TRANSCRIPT!  
 17  
 18  
 19  
 20          This transcript has not been checked, proofread or  
 21          corrected. It is a draft transcript, NOT a certified  
 22          transcript. As such, it may contain  
 23          computer-generated mistranslations of stenotype code,  
 24          resulting in inaccurate or nonsensical word

3

1           **ROUGH DRAFT/UNCERTIFIED TRANSCRIPT**  
 2           combinations, or untranslated stenotype symbols which  
 3           cannot be deciphered by non-stenotypists. Corrections  
 4           will be made in the preparation of the certified  
 5           transcript, resulting in differences in page and line  
 6           numbers, punctuation, and formatting.  
 7           THIS DRAFT TRANSCRIPT IS SUPPLIED TO YOU ON THE  
 8           CONDITION THAT UPON RECEIPT OF THE CERTIFIED  
 9           TRANSCRIPT, THIS DRAFT AND ANY COPIES THEREOF (IN  
 10          CONDENSED FORMAT OR OTHERWISE) WILL BE DESTROYED. THE  
 11          CERTIFIED TRANSCRIPT IS THE ONLY OFFICIAL TRANSCRIPT  
 12          WHICH MAY BE RELIED UPON FOR PURPOSES OF VERBATIM  
 13          CITATION OF TESTIMONY.  
 14          THE VIDEOGRAPHER: We are now on the record. My  
 15          name is David Lane, videographer for Golkow Litigation  
 16          Services.  
 17          Today's date is October 4th, 2024. Our  
 18          time on the record is 3:00 p.m. Eastern Standard Time.  
 19          This remote video deposition is being held  
 20          In the Matter of Flint Water Cases.  
 21          Our deponent today is Dr. Jennifer  
 22          Huffman, Ph.D.  
 23          All parties to this deposition are  
 24          appearing remotely and have agreed to the witness

4

1           **ROUGH DRAFT/UNCERTIFIED TRANSCRIPT**  
 15:00:35 2          being sworn in remotely. Due to the nature of remote  
 3          reporting, please pause briefly before speaking to  
 15:00:39 4          ensure all parties are heard completely.  
 15:00:40 5          Counsel, please introduce yourselves and  
 15:00:44 6          state who you represent.  
 15:00:45 7          MS. LABELLE: Deborah Labelle on behalf of the  
 15:00:47 8          plaintiffs.  
 15:00:48 9          MR. COHEN: Good afternoon. Jason Cohen on  
 15:00:50 10         behalf of the United States.  
 15:00:55 11         THE VIDEOGRAPHER: Our court reporter today is  
 15:00:57 12         Juliana Zajicek, and will now swear in our witness.  
 15:01:01 13         MS. LABELLE: Could we have Cary McGehee who has  
 15:01:04 14         joined put in her appearance as well.  
 15:01:06 15         MS. MCGEHEE: Thanks, Deb.  
 15:01:07 16         Hello everybody. Good afternoon. Cary  
 15:01:12 17         McGehee appearing on behalf of the plaintiffs.  
 18         (WHEREUPON, the witness was duly  
 19         sworn.)  
 15:01:29 20         THE VIDEOGRAPHER: Please begin.  
 21         JENNIFER HUFFMAN, PH.D.,  
 22         called as a witness herein, having been first duly  
 23         sworn, was examined and testified as follows:  
 24         EXAMINATION

41

43

15:58:36 **10** Q. If you can go to Page 14 of your -- oh,  
 15:58:53 **11** actually Page 13 of your April 11, 2024, report.  
 15:59:07 **12** In Paragraph 18, you say, the role that  
 15:59:09 **13** the media played in creating mass hysteria is  
 15:59:13 **14** important to consider, as outlined in Roy.  
 15:59:20 **15** Can you define what you mean by mass  
 15:59:23 **16** hysteria?  
 15:59:34 **17** A. It's the reaction to the Flint residents  
 15:59:38 **18** had to being repeatedly told that this he were  
 15:59:40 **19** poisoned, even when the average level of exposure  
 15:59:43 **20** indicated that any associated effects could not be  
 15:59:46 **21** reliably or validly measured and were not clinically  
 15:59:49 **22** meaningful.  
 15:59:52 **23** Q. And where do you get your evidence that  
 15:59:56 **24** there was such mass hysteria?

44

**1** **ROUGH DRAFT/UNCERTIFIED TRANSCRIPT**  
 16:00:00 **2** A. As described in Roy 2023.  
 16:00:04 **3** Q. So is it anything else other than you're  
 16:00:08 **4** relying upon Roy's report?  
 16:00:10 **5** A. That's the source of that statement.  
 16:00:13 **6** Q. And you believe, based upon that, that  
 16:00:17 **7** there was mass hysteria in the City of Flint over the  
 16:00:21 **8** Flint Water Crisis?  
 16:00:24 **9** A. That's as report -- according to the  
 16:00:26 **10** information provided by Roy.  
 16:00:28 **11** Q. I'm asking for your opinion now. Do you  
 16:00:30 **12** believe there was mass hysteria in the City of Flint  
 16:00:34 **13** over the Flint Water Crisis?  
 16:00:36 **14** A. Yes, I agree.



**ROUGH DRAFT/UNCERTIFIED TRANSCRIPT**

THE FOLLOWING FILE IS NOT AN OFFICIAL  
TRANSCRIPT. IT IS INTENDED ONLY TO AID  
IN CASE PREPARATION. THE FINAL TRANSCRIPT  
WILL BE DIFFERENT, BOTH IN FORM AND SUBSTANCE,  
FROM THIS ROUGH DRAFT TRANSLATION.  
YOU MAY SEE ERRORS AND OMISSIONS DURING  
THE REALTIME TRANSLATION THIS IS NOT  
AN UNUSUAL PROCESS AND THESE ERRORS AND  
OMISSIONS WILL BE CORRECTED ON THE FINAL  
TRANSCRIPT. PLEASE DO NOT TRY TO BRING THESE  
DISCREPANCIES TO THE ATTENTION OF THE REPORTER  
DURING THE COURSE OF THE DEPOSITION.

**UNOFFICIAL DRAFT TRANSCRIPT**

THIS IS AN UNOFFICIAL DRAFT TRANSCRIPT!

This transcript has not been checked, proofread or  
corrected. It is a draft transcript, NOT a certified  
transcript. As such, it may contain  
computer-generated mistranslations of stenotype code,  
resulting in inaccurate or nonsensical word

**ROUGH DRAFT/UNCERTIFIED TRANSCRIPT**

combinations, or untranslated stenotype symbols which  
cannot be deciphered by non-stenotypists. Corrections  
will be made in the preparation of the certified  
transcript, resulting in differences in page and line  
numbers, punctuation, and formatting.

THIS DRAFT TRANSCRIPT IS SUPPLIED TO YOU ON THE  
CONDITION THAT UPON RECEIPT OF THE CERTIFIED  
TRANSCRIPT, THIS DRAFT AND ANY COPIES THEREOF (IN  
CONDENSED FORMAT OR OTHERWISE) WILL BE DESTROYED. THE  
CERTIFIED TRANSCRIPT IS THE ONLY OFFICIAL TRANSCRIPT  
WHICH MAY BE RELIED UPON FOR PURPOSES OF VERBATIM  
CITATION OF TESTIMONY.